

Request GRANTED. The parties shall file all pretrial materials required by the Court's rules by February 6, 2023.

SO ORDERED.

01/26/2023

DATE



VICTOR MARRERO, U.S.D.J.

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DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 01/26/2023

Honorable Victor Marrero
United States District Court
500 Pearl Street
New York, New York 10007

January 25, 2023

CORRECTED LETTER MOTION (CORRECTS ECF 262)¹

Re: H. Daya International Co., Ltd. v. Do Denim LLC et al. (case no. 16-CV-8668-VM)

Dear Judge Marrero:

My office and Barry Skidelsky, Esq., represent plaintiff H. Daya International Co., Ltd., in this action. I write with the consent of all defendants' counsel for a short one-week extension of time from Jan. 30, 2023 to Feb. 6, 2023 for the parties file their joint pretrial order, trial briefs, joint proposed voir dire, proposed requests to charge, and list of witnesses with matters they will address.

Within this short extended time frame, to ensure compliance with the proposed extended deadline, the parties have agreed to (1) exchange drafts of their trial witness and exhibit lists, joint jury instructions, and joint jury voir dires by Jan. 31, 2023 at 5:00PM, and for (2) Plaintiff to provide its comments to Defendants regarding Defendants' proposed stipulation of facts and proposed jury voir dire (which were already provided to Plaintiff) by tomorrow, Jan. 26, 2023. The parties then will work diligently to resolve matters in a timely fashion through the usual back-and-forth communications among counsel.

The parties have been working diligently on these matters and respectfully submit that this short extension of time will enable the parties to complete the pre-trial requirements under Your Honor's rules more effectively without impairing trial preparation by the Court or the parties themselves. There has been no prior request for an extension of this deadline. This requested extension of time will not require the change of any other Court date or deadline and will not prejudice any party, as all counsel have consented.

For the above reasons, the parties respectfully request that this Court grant this agreed motion and extend the deadline from Jan. 30, 2023 to Feb. 6, 2023 for the parties to file their joint pretrial order, trial briefs, joint proposed voir dire, proposed requests to charge, and list of witnesses with matters they will address.

Respectfully,

Dennis Grossman

Dennis Grossman

cc: All counsel (by ECF)

¹ Within the hour, the earlier version of this letter motion (ECF 262) resulted from an inadvertent misreading of defense counsel's redline adjustments of plaintiff's draft.